



November 19, 2018

***Via Electronic Filing***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: CC Docket No. 96-115. "Petition for Emergency Declaratory Ruling"**

Dear Ms. Dortch:

On behalf of Ignition Toll-Free, I hereby submit comments **in support** of the Petition for Emergency Declaratory Ruling by 800 Response Information Services LLC, filed October 10, 2018

**Comments**

It is respectfully requested that the carriers be required to provide location-based services on an implied-consent basis. The two main issues are that some carriers have stopped providing location data, while others are requiring explicit consent via SMS, keypad input or a combination of the two. And both issues are preventing consumers from completing their calls as expected either because of being misrouted or not understanding what is being asked of them.

When a consumer sees a phone number for a product or service in their local market and dials it, they have a reasonable expectation that dialing that phone number will put them in direct contact with the business they are trying to reach.

People using cellular phones know that their proximity to the nearest cell-tower is used to complete their call. We rely on this same "coarse" location data to route callers. Their consent is the conscious act of dialing a phone number using their cellular phone. No other consent is required and it is unreasonable and confusing to ask for more. Because several carriers are not providing any location data or requiring some form of explicit consent, many callers are unable to reach the businesses they have

dialed, while others, such as the hearing impaired, or non-English speakers, are not able to understand what is being asked of them, further exacerbating the inability for people to complete their calls.

The policy argument for supporting our position is beyond reasonable: The location data needed to route callers is the same as what is needed to connect their cellular call. Therefore consumers' reasonable expectation to privacy is maintained and there is a greater policy argument for allowing them to complete their calls as they intended. In addition, carriers that are no longer offering coarse location data or those requiring explicit SMS consent are doing more harm to consumers than they are protecting them. A consumer's inability to reach the business they have just dialed puts into question fundamental expectations in our nation's telecommunications infrastructure.

Consumers today have had legitimate privacy rights violated by the tech-industry on what seems to be a weekly basis. And the incident that triggered this situation, Securus, is a result of abusing precise location data, not coarse. The one area of location services that has not ever been abused is coarse location data. The carriers' failure to make a distinction between precise and coarse location data hurts consumers the most. When precise location data is used explicit notice and consent must be required. Coarse location data relies on no more information than that which is required to originate a cellular call, therefore no notice or consent should be required and consumers should have their calls connect seamlessly.

Respectfully,

A handwritten signature in black ink, appearing to read 'Bruno Tabbi, Jr.', with a stylized, cursive script.

Bruno Tabbi, Jr.

President

Ignition Toll Free